

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	
	:	DECLARATION IN SUPPORT
-v.-	:	OF FINAL ORDER OF
	:	<u>FORFEITURE</u>
JOSHUA ADAM SCHULTE,	:	
	:	S2 17 Cr. 548 (JMF)
	:	
Defendant.	:	
	:	
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Michael D. Lockard, pursuant to Title 28, United States Code, Section 1746,  
declares under penalty of perjury as follows:

1. I am an Assistant United States Attorney in the Office of Damian Williams, United States Attorney for the Southern District of New York, and attorney for the Government herein. I am responsible for the above-captioned matter, and as such, I am familiar with the facts and circumstances of this proceeding. This declaration is submitted in support of the Government's submission for the entry of a Final Order of Forfeiture in the above-captioned case.

2. On or about March 5, 2024, the Court entered a Preliminary Order of Forfeiture as to Specific Property (the "Preliminary Order of Forfeiture") (D.E. 1135) with respect to JOSHUA ADAM SCHULTE (the "Defendant"), forfeiting to the United States all right, title and interest of the Defendant in the following specific property:

- a. One (1) Black Tower;
- b. One (1) Western Digital 1 TB HDD S/N: WCAU45355046;
- c. One (1) Western Digital 1 TB HDD S/N: WCAW32328401;
- d. One (1) Western Digital 1 TB HDD S/N: WCAU42139599;
- e. One (1) Western Digital 1 TB HDD S/N: WCAU45276871;

- f. One (1) Samsung 1 TB HDD S/N: S2AEJ18Z4408961;
- g. One (1) 160 GB Western Digital HDD S/N: WMAU2U189169;
- h. One (1) 640 GB Western Digital HDD S/N: WCASY0416918; and
- i. One (1) Western Digital 1 TB HDD S/N: WCAW32653861;

recovered from a search of the Defendant's residence in New York, New York on or about March 15, 2017 (items a through i, collectively, the "Specific Property").

3. The Notice of Forfeiture and the intent of the Government to dispose of the Specific Property was posted on an official government internet site ([www.forfeiture.gov](http://www.forfeiture.gov)) beginning on September 11, 2024 for thirty (30) consecutive days, through October 10, 2024, pursuant to Rule G(4)(a)(iv)(C) of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions, and proof of such publication was filed with the Clerk of the Court June 18, 2025 (D.E. 1151).

4. Since final publication of the Notice of Forfeiture, thirty (30) days have expired and no petitions or claims to contest the forfeiture of the Specific Property have been filed.

5. The Defendant is the only person and/or entity known by the Government to have a potential interest in the Specific Property.

6. Accordingly, the Government requests that the Court enter the proposed Final Order of Forfeiture.

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7. No previous application for the relief requested herein has been sought.

Dated: New York, New York  
June 18, 2025

JAY CLAYTON  
United States Attorney for the  
Southern District of New York

By:                     /s/                      
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